



— S C H E C K —
HILLEL COMMUNITY
— S C H O O L —

January 15, 2015

Dear FCC,

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 via Electronic Filing

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch,

On behalf of Scheck Hillel Community School in Miami, FL, I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

Scheck Hillel Community School presents many public performances a year, including anywhere from 10-25 performances of main stage productions, with more than 2500 attendees annually. Our school theatre program, as well as our many other programs, relies on the revenue generated in these performances to sustain and grow our in- and after-school theatre education opportunities for all of our 1000+ students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

Scheck Hillel Community School



Juda and Maria Diener Lower School | Samuel and Henrietta Scheck Middle School | Ben Lipson Upper School
19000 NE 25th Avenue | North Miami Beach, Florida 33180 | T 305.931.2831 | F 305.932.7463 | www.ehillel.org

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I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my school and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.

Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

- We use the following type of wireless devices:
 - microphones
 - in-ear communications (IFBs)
- We use up to 20-30 units in a typical presentation or performance.
- We frequently offer presentations that use wireless devices. We rarely go more than 2-3 days without assemblies, programs, or shows that use wireless devices. We also have an additional 8 wireless devices that we use for audio in our brand new athletics facility.
- We use the following bands and channels:
 - Low UHF (channels 14-36, 470 to 608 MHz)
 - High UHF (channels 38-51, the 600 MHz band, 614 MHz to 698 MHz)
 - Our microphones are able to tune to more than one frequency.
- Most of our wireless devices are digital, including our microphones. Our in-ear communications are analog.
- We own our wireless equipment.

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- For equipment that you own, its reasonable life expectancy is at least 10 years
- The move out of the 700 MHz band was a serious undertaking for our school.
 - It cost us over \$5000
 - It took us over a year to replace all of our devices.
- The FCC can reimburse the expense and the quality of the new devices would have to satisfy performance standards.
- In order to move out of the TV band the FCC should reimburse the expense and the quality of the new devices would have to satisfy performance standards.

I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—that some sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21st-century skills and knowledge for students and providing pride, entertainment, and dialogue in the communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,

Aaron Margolis

Jordan Alexander Ressler Endowed Chair of the Arts

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